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INTERNATIONAL LEGAL MATTERS

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LICENSED & ADMITTED
SUPREME COURT OF THE UNITED STATES OF AMERICA
U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT
U.S. COURT OF INTERNATIONAL TRADE
OTHER U.S. FEDERAL COURTS
STATES OF NEW YORK & MICHIGAN only
LONDON COURT OF INTERNATIONAL ARBITRATION

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Via ECF

22 October 2020

Hon. Victor Marrero, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

> Re: *El Omari v. Buchanan, et al*, 20-cv-2601 (S.D.N.Y.)

Dear Your Honor:

This letter is on behalf of the Plaintiff, Oussama El Omari, and is to bring two new legal authorities to the attention of the Court in supplement to the heading "Other similar litigation involving Dechert" in Plaintiff's July 10, 2020 response, contained in Dechert's pre-motion to dismiss letter bundle. See ECF No. 47-2. This letter also applies to other named defendants in this case, the KARV defendants, (ECF No. 53-2), Neil Gerrard (Hague Convention service pending), and James Buchanan (pre-motion letter bundled, but not filed as of this date).

Annexed as Exhibit 1 is a copy of a recent filed Particulars of Claim, dated October 1, 2020, in *Jihad Quzmar v. Dechert LLP, and Neil Gerrard*, Claim No. QB-2020-3142, High Court of Justice of England & Wales. The plaintiff in that case, Quzmar, is identified in paragraph 64(e) of this Plaintiff's Amended Complaint (ECF No. 31), as among other alleged targets, besides Plaintiff, El Omari. Similar to this case, Quzmar, who is and has been imprisoned in the UAE, alleges wrongs committed on behalf of the Ruler of RAK, Sheikh Saud, including bogus criminal convictions, torture, blackmail, and computer hacking, perpetrated by Dechert, Gerrard, and Buchanan, among others, as part of an investigation into alleged fraud at RAKIA by its former CEO, Khater Massaad, and involving the political rivalry between Sheikh Saud and Plaintiff's former boss, Sheikh Faisal. For a summary, see paragraphs 5-7, and 117-120 of Quzmar's complaint. Dechert and Gerrard's involvement in email hacking is alleged at paragraphs 78-79. At paragraph 79.1, Gerrard is alleged to have stated to Quzmar during one of his interrogations of Quzmar, "we [i.e. those conducting the investigation] have our own way of getting access to any emails" (or words to that effect)."

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Annexed as Exhibit 2 is a copy of a recently filed Complaint, dated October 15, 2020, in *Farhad Azima v. Nicholas Del Rosso and Vital Management Services, Inc*, Case No. 20-cv-954 (M.D.N.C.). The plaintiff in that case, Azima, is also the counterclaimant in *RAKIA v. Azima,* referenced in paragraph 27 of this Plaintiff's Amended Complaint. Vital Management Services, Inc., Dechert, Gerrard, Frank and Handjani, are also referenced in paragraph 27 of this Plaintiff's Amended Complaint. In summary, in his 11 count complaint, Azima, a resident of Missouri, alleges violation of multiple federal and state laws, and that he was a victim of a large scale computer hacking scheme to damage him by Vital Management Services, Inc. and its owner, Del Rosso, of North Carolina, who were hired by Gerrard and Dechert. Azima's stolen email data was then used by Gerrard and Dechert in their RAKIA legal dispute against Azima. The hacking was allegedly performed from India by two hack-for-hire companies, CyberRoot and BellTroX Info Tech Services, as part of the scheme. For a summary, see paragraphs 1-8 of Azima's complaint. As part of the scheme, allegedly Stuart Page, Del Rosso, Gerrard, Dechert, and Buchanan created a false evidentiary trail as a cover-up as part of their assertion of an innocent discovery of the stolen data. See paragraph 7 of Azima's complaint.

Respectfully submitted,

MOORE INTERNATIONAL LAW PLLC

BY: /s/ Scott M. Moore

Scott Michael Moore
Attorney at Law
Counsel for Plaintiff, Oussama El Omari

Attachments
Cc: All Counsel of Record, via ECF